

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

Elizabeth Sines, et al

**Plaintiffs**

**V**

**Case No: 3:17-cv-072-NKM**

**Jason Kessler, et al**

## Defendants

SWORN DECLARATION OF CHRISTOPHER CANTWELL AS TO THE  
OBSTRUCTION OF THESE PROCEEDINGS BY BUREAU OF PRISONS ("BOP")  
STAFF

I, Christopher Cantwell, do hereby aver under penalty of perjury this 22nd day of September, 2021, that the following is true and correct:

- 1) I am over the age of 18 and have personal knowledge of the following.
- 2) On September 13, 2021, I asked opposing counsel, Michael Bloch, to send to me by postal mail a physical copy of the Second Amended Complaint to review because I do not have access to a printer to produce a physical copy of the electronic copy in my possession.
- 3) On September 20, 2021, USP-Marion Communications Management Unit ("CMU") Case Manager Nathan Simpkins stated to me that the physical copy of the Second Amended Complaint referenced para 2, supra, had arrived in the mail but he did not know if he would be permitted to have it.
- 4) On September 21, 2021, Simpkins told me that the Second Amended Complaint was "sensitive material" and that USP-Marion staff were still trying to determine if he could view it.

5) On September 22, 2021, I asked about the status of the Second Amended Complaint to Kathy Hill, the Intelligence Research Specialist ("IRS") for the USP-Marion CMU. Hill stated that to me she had conferred with her "legal department," which I understood to mean Bureau of Prisons ("BOP") staff attorney Katherine Seireveld, and that USP-Marion staff had decided that "we're not going to help you with the civil case," contra the Court's Order of Doc 1067, meaning that I will not be able to possess the Second Amended Complaint. Having so averred, I sayeth no more under oath..

  
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Christopher Cantwell